

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



Antimicrobials Division (AD)

April 16, 2014

DP BARCODE: 419045

MRID: NA

SUBJECT: SilvaDur™

REG. NO.: 707-313

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use [ ] OR End-use Product [X]

INGREDIENTS:

<u>PC Code(s)</u>	<u>CAS Number</u>	<u>Active Ingredient:</u>
072501	74401-22-4	Silver

TEST LAB: Dow Microbial Control

SUBMITTER: The Dow Chemical Company

GUIDELINE: Product Chemistry

ORGANIZATION: AD\PSB\CTT

REVIEWER: Lynette T. Umez-Eronini

APPROVED BY: Karen P. Hicks

APPROVED DATE: April 16, 2014

COMMENT: This product is for non-food use.

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Office of Pesticide Programs

Antimicrobials Division (AD)

April 16, 2014

MEMORANDUM

SUBJECT: Product Chemistry Review for EPA Reg. 707-313  
Product Name: SilvaDur™  
DP Barcode: 419045

FROM: Lynette T. Umez-Eronini, Chemist *Lynette T. Umez-Eronini*  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

THRU: Karen Hicks, Team Leader  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

TO: Marshall Swindell PM#33/John C. Cowden  
Regulatory Management Branch I  
Antimicrobials Division (7510P)

Applicant: Rohm & Haas Co.

CODE: 362 Formula Change;

DATE DUE: June 17, 2014

PRODUCT FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Silver	2.95
<u>Inert Ingredient(s):</u>	<u>97.05</u>
Total:	100.0

## BACKGROUND:

The Dow Chemical Company has submitted an amendment to revise the Confidential Statement of Formula to incorporate changes in production of an integrated end-use product called SilvaDur™. The product is an antimicrobial preservative for odor control in the manufacturing of coatings, films and fibers. The product is for non-food contact use.

The product chemist reviewed the following data package:

1. Cover letter from Registrant to EPA, 3/17/2014.
2. Proposed Basic Confidential Statement of Formula (CSF), 3/6/2014.
- 3.

49343400	Cover letter same as Transmittal Document, 3/17/2014: Rohm & Haas Company (2014) Submission of Product Chemistry Data in Support of the Amended Registration of SilvaDur. Transmittal of 1 Study.
49343401	Trueblood, A. (2014) SilvaDur: Revised Product Chemistry. Unpublished study prepared by Dow Microbial Control. 15p.

4. Basic CSF, 4/15/2014.

## FINDINGS:

1. Basic CSF, 3/14/2014 is obsolete and is superseded by Basic CSF, 4/15/2014.
2. Product label, 4/28/2010 is used as a reference.
3. The nominal concentration of the active ingredient on Basic CSF, 4/15/2014 is consistent with the product label.
4. Support is provided in the cover letter for changes in the upper and lower certified limits of the inert ingredients and is acceptable.
5. Wider certified limits for the neutralizer are acceptable, while all other inert ingredients meet EPA standard certified limits.
6. Revised product chemistry data (see MRID 49343401) supports OPPTS 830.1550, 830.1620; and 830.1750; in general, addresses OPPTS 830.1600 and 830.1670 Discussion of formation of impurities to correspond with proposed changes in the production of the integrated end-use product in this submission.

## CONCLUSION:

Product Science Branch of Antimicrobials Division finds the Group A product chemistry data have been upgraded and met. The Basic CSF, 4/15/2014 is acceptable and supersedes all previous Basic CSFs.